

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
CLERKS OFFICE

DEAN DUMMER, DENNIS E. SMITH, MODHI  
GUIDE, ARJI GAUTHAMI, CHRISTOPHER PEPIN,  
KOUROSH ALIPOR, IRA A. TURRET SEP-IRA  
DATED 01/24/02, PAUL BOSTROM, individually  
and on behalf of all others similarly situated,

Plaintiffs,  
vs.

VASO ACTIVE PHARMACEUTICALS, INC.,  
JOHN J. MASIZ, JOSEPH FRATTAROLI and  
STEPHEN G. CARTER,

Defendants.

RICHARD SHAPIRO, Individually and on behalf of  
all others similarly situated,

Plaintiff,  
vs.

VASO ACTIVE PHARMACEUTICALS, INC., JOHN  
J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G.  
CARTER,

Defendants.

CHRISTOPHER PEPIN, on behalf of himself and all  
others similarly situated,

Plaintiff,  
vs.

VASO ACTIVE PHARMACEUTICALS, INC., JOHN  
J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G.  
CARTER,

Defendants.

[captions continued on the following page]

2004 JUN -8 A 1613 RCL  
Civil Action No.: 04-cv-10708 RCL

U.S. DISTRICT COURT  
DISTRICT OF MASS.

Civil Action No.: 04-cv-10720 NG

Civil Action No.: 04-cv-10763 RCL

**MOTION OF BRUCE A. YUNGMAN AND RONNIE YOUNG TO BE  
APPOINTED LEAD PLAINTIFF, AND FOR APPROVAL OF LEAD  
PLAINTIFF'S SELECTION OF LEAD COUNSEL**

MODHI GUDE, individually and on behalf of all others similarly situated,

Civil Action No.: 04-cv-10789 RCL

Plaintiff,  
vs.

VASO ACTIVE PHARMACEUTICALS, INC.,  
JOHN J. MASIZ, JOSEPH FRATTAROLI and  
STEPHEN G. CARTER,

Defendants.

JOSEPH ROSENKRANTZ, Derivatively on behalf of Vaso Active Pharmaceuticals,

Civil Action No.: 04-cv-10792 RCL

Plaintiff,  
vs.

BIOCHEMICS, INC. WILLIAM P. ADAMS,  
ROBERT E. ANDERSON, STEPHEN G. CARTER,  
GARY FROMM, JOHN J. MASIZ, KEVIN J.  
SEIFERT, BRUCE A. SHEAR, BRIAN STRASNICK,  
VASO ACTIVE PHARMACEUTICALS, INC.

Defendants.

KIM & JOSEPH BENEDETTO, Individually and on behalf of all others similarly situated,

Civil Action No.: 04-cv-10763 RCL

Plaintiffs,  
vs.

VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ and JOSEPH FRATTAROLI,

Defendants.

[Captions continued on the following page]

DEAN DUMMER, individually and on behalf of all others similarly situated,	Civil Action No.: 04-cv-10819 NG
Plaintiff, vs.  VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,	
Defendants.	
EDWARD A. TOVREA, Individually and on behalf of all others similarly situated,	Civil Action No.: 04-cv-10851 RCL
Plaintiff, vs.  VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,	
Defendants.	
KOUSHAL ALIPOR, on behalf of himself and all others similarly situated,	Civil Action No.: 04-cv-10877 RCL
Plaintiff, vs.  VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,	
Defendants.	
[captions continued on the following page]	

PAUL BOSTROM, individually and on behalf of all others similarly situated,	Civil Action No.: 04-cv-10948 RCL
Plaintiff, vs.  VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ and JOSEPH FRATTAROLI	
Defendants.	
IRA A. TURRET SEP-IRA DATED 01/24/02, PAUL BOSTROM, individually and on behalf of all others similarly situated,	Civil Action No.: 04-cv-10980 RCL
Plaintiff, vs.  VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,	
Defendants.	
JAMES KARANFILIAN, individually and on behalf of all others similarly situated,	Civil Action No.: 04-cv-10877 RCL
Plaintiff, vs.  VASO ACTIVE PHARMACEUTICALS, INC., JOHN J. MASIZ, JOSEPH FRATTAROLI and STEPHEN G. CARTER,	
Defendants.	

**MOTION OF BRUCE A. YUNGMAN AND RONNIE YOUNG TO BE  
APPOINTED LEAD PLAINTIFFS, AND FOR APPROVAL OF LEAD  
PLAINTIFFS' SELECTION OF LEAD COUNSEL**

Vaso Active Pharmaceuticals, Inc. securities investors Bruce A. Yungman and Ronnie Young (the "Proposed Lead Plaintiffs" or "Movants") hereby move this Court pursuant to Section 21D of the Securities Exchange Act of 1934 (the "Exchange Act"), as amended by the Private

Securities Litigation Reform Act of 1995 ("PSLRA") for an order that:

- a. appoints Bruce A. Yungman and Ronnie Young as Lead Plaintiffs for the above-captioned related actions; and
- b. approves Wolf Haldenstein Adler Freeman & Herz LLP Lead Counsel for the Class.

This Motion is supported by the accompanying Memorandum of Law, the accompanying Declaration of Fred Taylor Isquith, Esq., and the exhibits annexed thereto, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: June 7, 2004

Respectfully submitted,

**LAW OFFICES OF BRUCE G. MURPHY**

By: *Bruce G. Murphy* *CSA*  
Bruce G. Murphy, Esq.  
265 Llwyds Lane  
Vero Beach, FL 32963  
Telephone: (772) 231-4020

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ, LLP**

Fred T. Isquith, Esq.  
Christopher S. Hinton, Esq.  
270 Madison Avenue  
New York, New York 10016  
Telephone: (212) 545-4600  
Facsimile: (212) 545-4653